

FF.4 Duration of ROD to IAG Negotiation Completion

Section 1 - Program Activity Information

1.1 Program Activity: Duration of ROD to IAG Negotiation Completion

1.2 Program Activity Category: GPRA Annual Program Measure

1.3 Program Area: Federal Facility

1.4 EPA Sponsor:

Subject Matter Expert	Subject Area	Phone #
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Section 2 - Problem/Decision Objective

2.1 Problem: There is a statutory requirement for an IAG to be entered into within 180 days after the signature of the ROD signature at a Federal Facility. SARA Section 120(e) 2 states that “within 180 days [after the signature of the ROD], the head of the department, agency or instrumentality concerned shall enter into a IAG with the administrator for the expeditious completion by such department, agency or instrumentality of all necessary remedial action at such facility”. EPA needs to track and report on the duration between a ROD completion and entry into an IAG for all Federal facilities to monitor compliance to the CERCLA Section 120 statutory requirement.

2.2 Stakeholder(s): Headquarters Remedy staff, Regional IMCs, RPMs, Site Managers, Congress and the Public.

2.3 Decision-maker(s): Regions are responsible for entering the completion dates for the ROD and the information for the commencement of the corresponding IAG Negotiation with the start and completion dates. Users with roles that allow data entry on the project schedule are permitted to enter the required data for these decisions.

2.4 Decision: The performance measure computes the duration between the actual completion date entered for the ROD and the corresponding IAG Negotiation completion date. The duration of ROD to IAG will be calculated based on the actual completion date of the ROD (Action name = Record of Decision) and the latter of the dates that the Federal agency, EPA, and/or State sign the IAG, or the date the Letter of Intent to sign an IAG is signed by all parties, as reported in WasteLAN as the actual completion (Actual Completion) of FFA/IAG negotiations (Action Name = IAG Negotiation).

Section 3 - Information Needs

Name	Source	System	Table/Column
Site ID	This column will list the source of the information. The source could be a person (e.g., RPM); a document (e.g., ROD); or another system.	WasteLAN	Site.Site_Id
ROD action	ROD document	WasteLAN	Action.rat_code, act_code_id where rat_code = RO
ROD Anomaly Code	ROD	WasteLAN	Action.raa_code <> 'PC' OR 'PB' OR 'TO' OR 'TT' OR 'OA' OR 'OC'
Lead Code	ROD	WasteLAN	action.ralt_code = 'FF'
ROD completion date	ROD	WasteLAN	action.act_actl_cmpltn_date is NOT null
IAG action	IAG document	WasteLAN	Action.rat_code, action_code_id where rat_code = FI
IAG Anomaly Code	IAG Document	WasteLAN	action.ralt_code = 'FE'
IAG Negotiation completion date	IAG document	WasteLAN	Action.act_actl_cmpltn_date within user selected range

Section 4 - Scope/Universe

This information product addresses only Federal facility sites with final ROD signatures and IAG Negotiations entered into WasteLAN.

Section 5 - Data Quality Requirements

5.1 **Completeness:** In order to compute the duration, a ROD action (RO) must exist on the project schedule for the site and have an actual completion date, AND an IAG Negotiation (IN) action must exist in the project schedule for the site with an actual completion date. The DQO applies to all Federal Facilities Sites in CERCLIS with final ROD signatures and IAG Negotiations entered into WasteLAN.

5.2 **Accuracy:** The ROD completion is the date the final ROD was signed, and the IAG Negotiations completion date is the latter of the dates that the Federal agency, EPA, and/or State sign the IAG, or the date the Letter of Intent to sign an IAG is signed by all parties. There is objective evidence (documentation that a third party can examine and arrive at the same conclusion) to support the accomplishment of this measure.
Most accurate - Data is reported in an official decision source document.

- 5.3 Timeliness: This measure is based on the ROD and IAG Negotiation actions. Therefore, it's timeliness is dependent of the required for those actions. The HQ data sponsors reviews the data for this DO semi-annually and contacts the appropriate regional staff to address any outstanding issues. Regions enter action information real time. Although the GPRA measure is counted at fiscal year end, the action data should be entered in a timely basis (within 5 working days of actual start/completion/signature of decision documentation).
- 5.4 Consistency: There are clear national definitions and guidance. Guidance on this measure is available in the Superfund Program Implementation Manual.
Most Consistent - National Guidance and definitions have been distributed

Section 6 - Information Collection and Reporting

- 6.1 Source for the information: ROD, IAG, or Letter of Intent to sign an IAG
- 6.2 User interface User enters actions and actual completion dates for IAG Negotiations and rods on the Project Schedule.
- 6.3 System transfers This information is snapshot from region to Headquarters.
- 6.4 Internal outputs SCAP-14 Federal Facility; Federal Facility Accomplishment Report
- 6.5 Audit Reports: Federal Facility Audit Report
- 6.6 External outputs Annual Report to Congress
- 6.7 Guidance documentation:
- ▶ Superfund Program Implementation Manual (SPIM) – OSWER Directive 9200.3-14-1G-Q